

Moshe Rothenberg, Esq.
Attorney at Law
880 E. Elmer Road
Vineland, NJ 08360
Phone: (856) 236-4374
Fax: (856) 405-6769
Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

IN RE: Hersch Goldstein

Case No: 22-15671/MBK
Chapter 13

**NOTICE OF MOTION TO VACATE THE AUTOMATIC
STAY TO PERMIT BEIT DIN LITIGATION**

HEARING DATE: April 26, 2023 at 9:00 am

TO: Albert Russo
Standing Chapter 13 Trustee
CN 4853
Trenton, NJ 08650-4853

AND ALL CREDITORS
and their counsel – see attached service list

PLEASE TAKE NOTICE that on the 26th day of April, 2023, at 9:00 A.M., the undersigned, attorney for debtor, shall make application to this Honorable Court for an Order to Vacate the Automatic Stay To Permit Beit Din litigation.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the attached Certification of Hersch Goldstein, the arguments of counsel and such other and further proofs as may be adduced at the hearing hereof.

PLEASE TAKE FURTHER NOTICE that the moving party believes that no brief is necessary in support of the within application due to the fact that the matter involves no complex issues of law or fact.

PLEASE TAKE FURTHER NOTICE that if you wish to contest the within Motion, you must file opposition with the office of the Clerk of the Bankruptcy Court, and serve upon the undersigned, 7 days in advance of the aforesaid hearing, your responding papers stating with particularity the basis of your opposition to the within Motion. A copy of the proposed Order which is sought is enclosed with this Motion.

Dated: March 27, 2023

/s/ Moshe Rothenberg, Esq.

**Moshe Rothenberg, Esq.
Attorney for Debtor**